

PHILLIP A. TALBERT
United States Attorney
JOSEPH D. BARTON
HENRY Z. CARBAJAL III
Assistant United States Attorneys
2500 Tulare Street, Suite 4401
Fresno, CA 93721
Telephone: (559) 497-4000
Facsimile: (559) 497-4099

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

IRMA OLGUIN, JR.,
and JAKE SOBERAL

Defendants.

CASE NO. 1:23-MJ-00136-SKO

STIPULATION TO CONTINUE PRELIMINARY
HEARING AND EXCLUDE TIME

The parties stipulate as follows:

1. The complaint was issued in this case on November 8, 2023, and the defendants made their initial appearances the following day. The preliminary hearing was scheduled for January 25, 2024, and was then continued until April 4, 2024, with appropriate time exclusions, so that defense counsel could review discovery and consider a pre-indictment resolution of the case.

2. The government has produced initial discovery to defense counsel. The discovery is over one million pages, and it includes detailed financial records, text messages, emails, and other correspondence, and interview reports. The parties have met and conferred regarding the evidence in the case and the terms of potential plea agreements.

3. The parties now agree to further continue the preliminary hearing until May 16, 2024. The parties do not expect to request any additional continuances.

4. The parties agree that good cause exists for the continuance because the extension is required to allow defense counsel reasonable time to complete their review of the discovery, prepare for any litigation, and fully consider a pre-indictment resolution of the case.

5. The parties agree that the interests of justice served by granting this continuance outweigh the best interests of the public and the defendants in a speedy trial. The parties also agree that the period from March 15, 2024, through May 16, 2024, should be excluded. Fed. R. Crim. P. 5.1(d); 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

IT IS SO STIPULATED.

Dated: March 15, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ Joseph Barton
Joseph Barton
Henry Carbajal III
Assistant United States Attorneys

Dated: March 15, 2024

/s/ Daniel Olmos
Daniel Olmos
Counsel for Irma Olguin, Jr.

Dated: March 15, 2024

/s/ Eric MacMichael
Eric MacMichael
Counsel for Jake Soberal

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CASE NO. 1:23-MJ-00136-SKO

ORDER CONTINUING PRELIMINARY
HEARING AND EXCLUDING TIME

The Court has read and considered the parties' stipulation to further continue the preliminary hearing in this case and exclude time. The Court finds there is good cause for the continuance so as to allow defense counsel reasonable time to complete their review of the discovery, prepare for any litigation, and fully consider a pre-indictment resolution of the case. The Court also finds that the interests of justice served by granting the continuance outweigh the interests of the public and the defendants in a speedy trial. Therefore, for good cause shown:

1. The preliminary hearing is continued from April 4, 2024, until May 16, 2024, at 2:00 p.m., and the defendants shall appear at that time before the Fresno duty magistrate judge; and
2. The period from April 4, 2024, through May 16, 2024, shall be excluded pursuant to

1 Federal Rule of Criminal Procedure 5.1(d) and 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

2 IT IS SO ORDERED.

3
4 Dated: **March 18, 2024**


UNITED STATES MAGISTRATE JUDGE